



*Amanda E. Potter*  
Assistant Vice President-  
Senior Legal Counsel

AT&T Services, Inc.  
1120 20<sup>th</sup> Street, NW  
Suite 1000  
Washington, DC 20036

Phone: 202.457.2103  
E-mail: amanda.potter@att.com

October 30, 2017

**VIA ECFS**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: *Amendment to the Commission's Rules Concerning Market Modification;  
Implementation of Section 102 of the STELA Reauthorization Act of 2014 –  
MB Docket No. 15-71***

Dear Ms. Dortch:

Consistent with the Commission's 2015 order in the above-referenced docket,<sup>1</sup> enclosed please find results for the preliminary evaluations of stations WBIQ, WBRC, WIAT, WVTM, and WABM in Birmingham, AL.

Please contact me should you have any questions.

Respectfully submitted,

*/s/ Amanda E. Potter*

Amanda E. Potter

Enclosure

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<sup>11</sup> *Amendment to the Commission's Rules Concerning Market Modification; Implementation of Section 102 of the STELA Reauthorization Act of 2014*, Report and Order, 30 FCC Rcd 10406 (2015).



October 30, 2017

Via FedEx and Fax

Derek Farr  
Chairman  
Randolph County Commission  
146 Vaughn Street  
Roanoke, AL 36274  
Fax 256-357-2365

Dear Chairman Farr:

Please find attached the results of your request for a preliminary evaluation of a potential market modification for **Randolph County, AL**.

DIRECTV's engineering staff was given the areas to evaluate for stations **WBRC (FOX), WBIQ (PBS), WVTM (NBC), WABM2 (ABC), and WIAT (CBS)** on our **Birmingham, AL** spot beams, and have found that:

- DIRECTV's SD spot beam does not cover **1** current zip code in **Randolph County**
- DIRECTV's HD spot beam covers **all** current zip codes in **Randolph County**

Please see attached for specific spot beam zip code coverage information. DIRECTV will forward the results of this preliminary evaluation to the FCC for their records.

Thank you for your letter and your interest in DIRECTV programming.

Sincerely,

DIRECTV

# Form of Certification Regarding Spot Beam Coverage

1. My name is Phil Goswitz. I am SVP of Engineering at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.

2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
WBIQ	AL	RANDOLPH

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:

- The measured performance of the spot beam covering this Television Station's local market.
- Estimated atmospheric effects for reception of the signal.
- Estimated levels of interference.
- The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
- The target availability figure used for all television stations offered on the spot beam.

4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:

- Signal availability.
- Clear sky signal margin.
- Total carrier-to-interference ratio.

5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.

6. Based on this analysis, DIRECTV:

- HD  SD Can provide service to all the zip codes associated with this request.\*
- HD  SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.
- HD  SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.\* The list of unserved zip codes is attached.

\* IMPORTANT: SD coverage will no longer be available after 2018/2019 when the existing MPEG 2 satellite is removed from service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/30/17  
Date

Signature

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WIAT	AL	RANDOLPH

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WVTM	AL	RANDOLPH

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WABM-DT	AL	RANDOLPH

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Station	Zip	USPSFIPS	State	County	Covered_SD	Covered_HD	Evaluation Completed
WABM-DT	36255	01111	AL	RANDOLPH	YES	YES	10/26/2017
WABM-DT	36258	01111	AL	RANDOLPH	YES	YES	10/26/2017
WABM-DT	36263	01111	AL	RANDOLPH	YES	YES	10/26/2017
WABM-DT	36264	01111	AL	RANDOLPH	YES	YES	10/26/2017
WABM-DT	36266	01111	AL	RANDOLPH	YES	YES	10/26/2017
WABM-DT	36270	01111	AL	RANDOLPH	could not find in either zip code database	could not find in either zip code database	10/26/2017
WABM-DT	36274	01111	AL	RANDOLPH	NO	YES	10/26/2017
WABM-DT	36276	01111	AL	RANDOLPH	YES	YES	10/26/2017
WABM-DT	36278	01111	AL	RANDOLPH	YES	YES	10/26/2017
WABM-DT	36280	01111	AL	RANDOLPH	YES	YES	10/26/2017
WBIQ	36255	01111	AL	RANDOLPH	YES	YES	10/26/2017
WBIQ	36258	01111	AL	RANDOLPH	YES	YES	10/26/2017
WBIQ	36263	01111	AL	RANDOLPH	YES	YES	10/26/2017
WBIQ	36264	01111	AL	RANDOLPH	YES	YES	10/26/2017
WBIQ	36266	01111	AL	RANDOLPH	YES	YES	10/26/2017
WBIQ	36270	01111	AL	RANDOLPH	could not find in either zip code database	could not find in either zip code database	10/26/2017
WBIQ	36274	01111	AL	RANDOLPH	NO	YES	10/26/2017
WBIQ	36276	01111	AL	RANDOLPH	YES	YES	10/26/2017
WBIQ	36278	01111	AL	RANDOLPH	YES	YES	10/26/2017
WBIQ	36280	01111	AL	RANDOLPH	YES	YES	10/26/2017
WBRC	36255	01111	AL	RANDOLPH	YES	YES	10/26/2017
WBRC	36258	01111	AL	RANDOLPH	YES	YES	10/26/2017
WBRC	36263	01111	AL	RANDOLPH	YES	YES	10/26/2017
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WBRC	36280	01111	AL	RANDOLPH	YES	YES	10/26/2017
WIAT	36255	01111	AL	RANDOLPH	YES	YES	10/26/2017
WIAT	36258	01111	AL	RANDOLPH	YES	YES	10/26/2017
WIAT	36263	01111	AL	RANDOLPH	YES	YES	10/26/2017
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WIAT	36280	01111	AL	RANDOLPH	YES	YES	10/26/2017
WVTM	36255	01111	AL	RANDOLPH	YES	YES	10/26/2017
WVTM	36258	01111	AL	RANDOLPH	YES	YES	10/26/2017
WVTM	36263	01111	AL	RANDOLPH	YES	YES	10/26/2017
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